

REMARKS

In the Office Action mailed February 5, 2007, the Examiner noted that claims 1-27 were pending, that claims 1-27 have been rejected claims. No claims have been amended, no claims have been canceled, no new claims have been added and, thus, in view of the forgoing claims 1-27 remain pending for reconsideration which is requested. No new matter has been added. The Examiner's rejections are traversed below.

REJECTIONS under 35 U.S.C § 103

Claims 1-5, 9-13, 17-21 and 25-27 stand rejected under 35 U.S.C. § 103(a) as being obvious over Isaacs, U.S. Patent No. 5,894, 308 in view of Borrel, U.S. Patent No. 5,448,686. In the Office Action, the Examiner states that "Isaacs teaches the limitations ... with the exception of maintaining the adjacent planes in the model but not displayed. However, Borrel discloses a system/method of simplifying a model using recursive levels and simplification factors comprising an octtree, where the octtree maintains all of the vertices of the model regardless of being displayed." Borrel is a method of simplification of a model by clustering a set of vertices and creating a representative vertex from the cluster of vertices. Borrel, column 5 lines 23-38 state:

FIG. 3a shows a two-dimensional object 32 and FIG. 3b shows the cells used to simplify the object 32. FIG. 3c illustrates the octtree structure representative of a cluster of simplified vertices: **V5, V6, and V7**. Once the octtree is constructed, it provides the vertices of the lowest simplification level. All higher simplification levels are obtained **by computing representative vertices for each intermediate node of the octtree**. This may be accomplished in a bottom-up traversal of the octtree. At each node, use the representative vertices of the children nodes as a cluster, and determine a single representative vertex (V^*). That vertex is stored at the node of the octtree. To obtain the vertices that correspond to a particular simplification level, it is necessary only to consider vertices of octtree leaves of that level of the octtree.

Thus, what is discussed in Figs. 3a and 3b of Borrell is the simplification of a cluster of vertices $\{V5, V6, V7\}$ into the single representative vertex V^* . In contrast, the present invention does not remove points from the model or create a representative point but rather suppresses the display of the edge line when the angle between plane normals is less than a predetermined value. That is, the points representing the edge line are not merged into a representative point but remain in the model. See "displaying the simplified model so ... a line between the adjacent planes is maintained in the model and not displayed," as in claim 1. Further, even if Borrell functioned as the Examiner contents, edges that ended up being in separate cells but were otherwise adjacent

would still be displayed.

For the reasons stated above, Isaacs and Borrel taken separately or in combination fail to teach or suggest the elements of claims 1, 9 and 17 and the claims dependent therefrom.

Withdrawal of the rejection is respectfully requested.

Claims 6, 7, 14, 15, 22 and 23 stand rejected under 35 U.S.C. § 103(a) as being obvious over Isaacs in view of Borrel in further view of Brittain, U.S. Patent No. 6,072,498.

Brittain adds nothing to Isaacs and Borrel with respect to the features and benefits discussed above.

Isaacs, Borrel and Brittain taken separately or in combination fail to teach or suggest the elements of claims 6, 7, 14, 15, 22 and 23.

Claims 8, 16 and 14 stand rejected under 35 U.S.C. § 103(a) as being obvious over Isaacs in view of Borrel in further view of Brittain and in further view of Schuur, U.S. Patent No. 5,504,853.

Brittain and Schuur add nothing to Isaacs and Borrel with respect to the features and benefits discussed above.

Isaacs, Borrel, Brittain and Schuur taken separately or in combination fail to teach or suggest the elements of claims 8, 16 and 14.

SUMMARY

It is submitted that the claims satisfy the requirements of 35 U.S.C. § 103. It is also submitted that claims 1-27 continue to be allowable. It is further submitted that the claims are not taught, disclosed or suggested by the prior art. The claims are therefore in a condition suitable for allowance. An early Notice of Allowance is requested.

If any further fees, other than and except for the issue fee, are necessary with respect to this paper, the U.S.P.T.O. is requested to obtain the same from deposit account number 19-3935.

Respectfully submitted,

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